

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 2, 2015

Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

GA2014-23

**Subject: General Order (G.O.) 112-E Comprehensive Operation and Maintenance  
Inspection of Southern California Gas Company's Basin Transmission Facilities**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-E Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Basin Transmission area (Inspection Unit) on April 7-14, 2014. The inspection included a review of the Inspection Unit's records for calendar year 2013 and random field inspections of pipeline facilities in the Brea, Olympic, and Saticoy transmission districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff did not identify any probable violations of G.O. 112-E, Reference Title 49 Code of Federal Regulations (CFR), Part 192. A summary of recommendations that SED made to the Inspection Unit is enclosed in the "Summary of Inspection Findings".

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG.

If you have any questions, please contact Michelle Wei, at (213) 620-2780.

Sincerely,

A handwritten signature in blue ink, which appears to read "Kenneth B", followed by a long horizontal line that ends in a small loop.

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Michelle Wei, SED/GSRB  
Jeff Koskie, Sempra  
Kan Wai Tong, SED/GSRB

**Summary of Inspection Findings**  
**2014 SCG Basin Transmission Inspection**  
**April 7-14, 2014**

**Concerns and Recommendations Summary**

1. During record review, SED encountered several instances where records for two lines were kept together and then split apart. One of those lines was moved into a separate folder without showing the maintenance history of the line. SED recommends that SCG reference all previous documentations to enable the SCG personnel track and monitor the history and location of the records for those lines.
2. During record review, SED found that some of the test results from odor intensity tests were recorded with a misplaced decimal point. The regulation requires that the odor of gas be readily detectable by a person with a normal sense of smell at a concentration in air of one-fifth of the lower explosive limit (LEL). Some of the odor intensity test records (SCG Form 3991) showed the percentage of gas in air when it gas was first readily detectable were recorded as 2.5% to 5% gas in air. The recorded information implies that the concentration of the gas in air when it was readily detectable was greater than the lower explosive limit. The SCG employee that conducted the odor intensity tests informed SED that it was a typo with misplaced decimal point. SED reviewed this employee's Operator Qualification records for the covered task and confirmed this employee was qualified and the qualification records were current. SED recommends that SCG review this covered task procedure with its employees and emphasize the importance of data entry accuracy and implement QA/QC process to prevent recurrence.
3. SED observed that some of the SCG producer sites' monthly inspections and records were incomplete due to shut-in of a producer. While SCG documents each producer shut-in, it does not document its follow up efforts to contact the producer to reschedule the monthly inspection once the producer starts feeding into SCG pipeline. SED recommends that SCG record its efforts to contact the producer in order to demonstrate its efforts to reschedule the inspection.